LAW OFFICES OF ALEXANDER M. DUDELSON

ALEXANDER M. DUDELSON

26 COURT STREET - SUITE 2306 Brooklyn, New York 11242 (718) 855-5100 FAX (718) 624-9552

OF COUNSEL LOUIS R. ROSENTHAL YEHUDA FARKAS

FABIAN G. PALOMINO (1924 - 2014)

March 13, 2025

VIA ECF

Honorable Naomi Reice Buchwald United States District Court Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Rina Oh n/k/a Rina Oh Amen v. Virgina L. Giuffre Re:

> > Case No.: 1-21-cv-08839 (NRB)

Your Honor:

I am the attorney for the plaintiff in the above referenced matter. This letter is respectfully submitted to the Court, on the consent of Kathleen R. Thomas, Esq. and Jill Roth, Esq., attorneys for the defendant, to request an extension of the briefing schedule for defendant's motion for summary judgment.

On December 18, 2024, Your Honor directed the following motion schedule: Motions due by 2/17/2025, Responses due by 3/21/2025; and Replies due by 4/14/2025. (Dkt. 66). On February 19, 2025, defendant filed her motion for summary judgment. The parties propose the following modified briefing schedule:

- 1. Plaintiff's opposition on or before April 7, 2025; and
- Defendant's reply on or before April 30, 2025. 2.

This is the first request for a modification of the motion for summary judgment briefing schedule. The reason for this request is that the undersigned has an upcoming hearing and trial the week of March 17, 2025, and other motions that require briefing.

Thank you for your consideration.

Respectfully submitted,

Alexander Dudelson

Alexander M. Dudelson

Via ECF: All parties.